

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND
EXCHANGE COMMISSION,**

Plaintiff,

v.

PTG CAPITAL PARTNERS LTD, et al.,

Defendants.

15-CV-04290 (LAK)

DECLARATION OF CHRISTOPHER R. KELLY

I, Christopher R. Kelly, to the best of my knowledge, information, or belief, declare and state as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and the District of Columbia. I currently am Senior Trial Counsel in the Securities and Exchange Commission's Philadelphia Regional Office and represent the Securities and Exchange Commission in this matter. I submit this declaration in support of the Securities and Exchange Commission's Motion for Alternative Means of Service [ECF Doc. No. 49].

2. Neither defendant Nedko Nedev, nor any of the other defendants, has responded to the Securities and Exchange Commission's interrogatories, document request, and requests for admission, nor has defendant Nedev appeared for his deposition.

3. Attached as Exhibit 1 is a true and correct copy of a December 18, 2015, letter from Matthew B. Greiner to the Ministry of Justice and European Legal Integration in Sofia, Bulgaria (the "Ministry of Justice"), without enclosures.

4. Attached as Exhibit 2 is a true and correct copy of a December 22, 2015, letter from Petar Rashkov, the Director International Legal Assistance and European Affairs at the Ministry of Justice, to David W. Snyder.

5. Attached as Exhibit 3 is a true and correct copy of an October 4, 2016, letter from Petar Rashkov, the Director International Legal Assistance and European Affairs at the Ministry of Justice, to David W. Snyder, without enclosures.

6. Attached as Exhibit 4 is a true and correct copy of a September 15, 2017, letter from Marlee Engel to the Ministry of Justice, without enclosures.

7. Attached as Exhibit 5 is a true and correct copy of a September 21, 2017, letter from Bilyana Belyakova, the Director International Legal Assistance and European Affairs at the Ministry of Justice, to David W. Snyder.

8. Attached as Exhibit 6 is a true and correct copy of a November 23, 2017, letter from Bilyana Belyakova, the Director International Legal Assistance and European Affairs at the Ministry of Justice, to David W. Snyder, without enclosures.

9. Attached as Exhibit 7 is a true and correct copy of excerpts from Bulgaria's 2008 Response relating to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

10. Attached as Exhibit 8 is a true and correct copy of the court's slip opinion in *SEC v. Ruettiger*, No. 11-cv-02011 (D. Nev. July 23, 2012).

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 14, 2018, in Philadelphia, Pennsylvania.


Christopher R. Kelly

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